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By: C. LUNT, Deputy

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

Coordination Proceeding
Special Title (Rule 1550(b))
IN RE COORDINATED LATEX
GLOVE CASES

JCCP 4003
CASE MANAGEMENT ORDER NO. 2
RE: DISCOVERY

1 **I. Discovery Overview**

2 **A. Intention of Court**

3 The Court intends the discovery in this coordinated proceeding to proceed in an
4 orderly and expeditious fashion. Unnecessary costs and duplication of discovery are to be
5 avoided. Initial discovery will be in the form of questionnaires designed to obtain basic
6 background information on all parties to the coordinated cases.

7 **B. Protective Order Governing Confidentiality**

8 This litigation could well require the production of millions of documents, some
9 of which may contain trade secret material. Since many of the defendants herein, as well as
10 plaintiff's counsel are involved in the MDL proceedings in which a protective order was
11 entered, in order to avoid unnecessary duplication of effort, much of the MDL protective
12 order has been adopted for use in this proceeding. Said order is filed herewith as Case
13 Management Order No. 3. All parties in this Coordination proceeding are bound by this
14 protective order.

15 **C. Cooperation**

16 Counsel will cooperate with each other and exercise civility in all aspects of this
17 litigation. Unless contrary to an order of the Court, the affected parties (and when
18 appropriate, a nonparty witness) may stipulate, in writing, to alter, amend or modify any
19 practice relating to: 1) noticing or conducting a deposition; 2) dates or manner of production
20 of documents, interrogatories, or requests for admission. Stipulations for the extension of
21 discovery cutoffs and deadlines are not valid without prior court approval.

22
23 **II. Initial Discovery**


24 In order to ensure that all parties to this coordinated proceeding timely obtain the
25 requisite background information from which they can prepare more focussed discovery,
26 liaison counsel for plaintiffs and for defendants, respectively, will provide the Court draft
27 questionnaires, on or before September 18, 1997. It is intended that when finalized plaintiff's
28 questionnaire will be served on all defendants and visa versa. A meeting of the Court with

liaison counsel will be held on October 2, 1997 at 1:30 p.m. to finalize the questionnaires. It is the intent of the Court that each party to this coordinated proceeding shall fully complete a questionnaire. This questionnaire shall be distributed to all present and future parties to this coordinated proceeding. Thereafter any new party to this coordinated proceeding shall prepare and file the appropriate questionnaire no later than 60 days after making its initial general appearance in a case in this coordinated proceeding.

IT IS SO ORDERED.

Dated: SEP 30 1997


WILLIAM C. PATE
Judge of the Superior Court

<p align="center">Superior Court of California County of San Diego</p>		<p align="center">COURT USE ONLY</p> <p align="center">  OCT - 1 1997 By: C. LUNT, Deputy </p>
NONPROFIT COORDINATION PROCEEDING SPECIAL TITLE (RULE 1550(b))		
DEFENDANT(S) IN RE COORDINATED LATEX GLOVE CASES		
CLERK'S CERTIFICATE OF SERVICE BY MAIL (CCP 1013(4))	CASE NUMBER JCCP 4003	

I, **KENNETH E. MARTONE**, Clerk of the Superior Court of the State of California, for the County of San Diego, do hereby certify that: I am not a party to the cause referred to herein; On the date shown below, I placed a true copy of:

CASE MANAGEMENT ORDER NO. 3
CASE MANAGEMENT ORDER NO. 2 RE: DISCOVERY

****SERVED VIA FAX****

~~In a separate envelope addressed to each addressee shown below, each envelope was then sealed and, with postage thereon fully prepaid, was deposited in the United States Postal Service at~~

☒ San Diego, California ☐ Vista, California ☐ El Cajon, California

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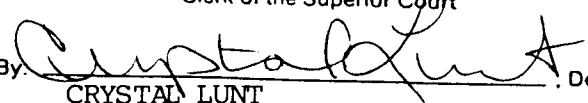
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Dated: OCTOBER 1, 1997

KENNETH E. MARTONE
Clerk of the Superior Court

By:  Deputy
CRYSTAL LUNT

CLERK'S CERTIFICATE OF SERVICE BY MAIL (CCP 1013(4))

SUPCT-286 (Rev. 3-90)